

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

MICHAEL J. BYNUM AND CANADA HOCKEY LLC d/b/a EPIC SPORTS §  
*Plaintiffs* §  
  
v. § CIVIL ACTION NO. 4:17-cv-00181  
  
BRAD MARQUARDT, §  
in his individual capacity §  
  
*Defendant.* §

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
FILE RESPONSE TO DEFENDANT BRAD MARQUARDT'S  
RULE 12(C) MOTION FOR JUDGMENT ON THE PLEADINGS**

Plaintiffs, Michael J. Bynum and Canada Hockey LLC d/b/a Epic Sports ("Plaintiffs"), file this Unopposed Motion for Extension of Time to file their Response to Defendant Brad Marquardt's ("Defendant") Rule 12(c) Motion for Judgment on the Pleadings, and in support thereof, would respectfully show the Court as follows:

1. Pursuant to Rule 7.2, Plaintiffs respectfully request an extension of time to submit their Response to Defendant's Rule 12(c) Motion for Judgment on the Pleadings [DOC 285]. Defendant filed his Motion on April 2, 2025. Plaintiffs' Response to Defendant's Motion is currently due April 16, 2025.
2. Plaintiffs seek a thirty (30) day extension of time to respond, making its new deadline May 16, 2025. Lead counsel for Plaintiff is currently out of the country and the requested extension will provide Plaintiffs sufficient time to adequately respond to Defendant's Motion without causing undue delay.
3. Counsel has conferred with counsel for Defendant, Ray Chester, via e-mail regarding the requested extension on April 8, 2025, wherein counsel for Defendant indicated he does not oppose the present Motion.
4. For the foregoing reasons, Plaintiffs, Michael J. Bynum and Canada Hockey LLC d/b/a

Epic Sports, respectfully requests the Court grant this Unopposed Motion for an Extension of Time to file their Response to Defendant Brad Marquardt's Rule 12(c) Motion for Judgment on the Pleadings and enter an order extending the deadline by thirty (30) days to **May 16, 2025**.

Respectfully submitted,

**PHELPS DUNBAR LLP**

/s/Andrew W. Coffman

David L. Patrón (Attorney-In-Charge)  
Texas Bar No. 24101336  
Lindsay Calhoun  
Texas Bar No. 24134740  
James H. Gilbert  
Louisiana Bar No. 36468  
PHELPS DUNBAR LLP  
Canal Place | 365 Canal Street, Suite 2000  
New Orleans, Louisiana 70130  
Telephone: (504) 566-1311  
Facsimile: (504) 568-9130  
Email: [patrond@phelps.com](mailto:patrond@phelps.com)  
[lindsay.calhoun@phelps.com](mailto:lindsay.calhoun@phelps.com)  
[james.gilbert@phelps.com](mailto:james.gilbert@phelps.com)

and

Andrew W. Coffman  
Mississippi Bar No. 106207  
PHELPS DUNBAR LLP  
105 East Main Street, Suite 201  
Post Office Box 1220  
Tupelo, MS 38802-1220  
Telephone: (662) 842-7907  
Facsimile: (662) 842-3873  
Email: [andrew.coffman@phelps.com](mailto:andrew.coffman@phelps.com)

and

Charles W. Prueter (Admitted *Pro Hac Vice*)  
FORTIF LAW PARTNERS, LLC  
2021 Morris Avenue, Suite 300  
Birmingham, Alabama 35203  
Telephone: 205-792-2639  
Email: [charles@fortif.com](mailto:charles@fortif.com)

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

I certify that, on April 8, 2025, the parties conferred regarding the filing of this motion, and the other parties do not oppose this motion.

/s/ *Andrew W. Coffman*  
Andrew W. Coffman

**CERTIFICATE OF SERVICE**

I certify that on April 15, 2025, this document was filed electronically and will be served on all counsel of record in accordance with the Federal Court of Civil Procedure via the Court's ECF system.

/s/ *Andrew W. Coffman*  
Andrew W. Coffman

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MICHAEL J. BYNUM AND CANADA  
HOCKEY LLC d/b/a EPIC SPORTS**

V.

**BRAD MARQUARDT,  
in his individual capacity**

*Defendant.*

**ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT BRAD MARQUARDT'S MOTION FOR SUMMARY JUDGMENT**

Having considered the Unopposed Motion for Extension of Time to File Response to Defendant Brad Marquardt's Rule 12(C) Motion for Judgment on the Pleadings (the "Motion") filed by Plaintiffs Michael J. Bynum and Canada Hockey, LLC d/b/a Epic Sports,

**IT IS HEREBY ORDERED** that the Motion is **GRANTED** and Plaintiffs' deadline to respond to Defendant Brad Marquardt's Rule 12(C) Motion for Judgment on the Pleadings is extended by and through **May 16, 2025**.

SIGNED this \_\_\_\_\_ day of April, 2025.

Andrew S. Hanen  
United States District Judge